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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 4:21-cr-00005-RRB-SAO
)
Plaintiff,) COUNT 1:
) STALKING
vs.) Vio. of 18 U.S.C. § 2261A(2)
)
ROGER KEELING,)
)
Defendant.) ENHANCED STATUTORY
) PENALTIES ALLEGATION:
) 18 U.S.C. § 2261(b)(6)
)
)
)
)

I N D I C T M E N T

The Grand Jury charges that:

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COUNT 1

Starting on or about November 2020, and until on or about January 2021, in the District of Alaska, the defendant, ROGER KEELING, with intent to harass and intimidate another person, to wit: Victim 1, did knowingly use an interactive computer service, electronic communications service, and electronic communications system to engage in a course of conduct that placed Victim 1 in reasonable fear of death and serious bodily injury and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1.

All of which is in violation of 18 U.S.C. § 2261A(2).

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ENHANCED STATUTORY PENALTIES ALLEGATION

At the time the defendant, ROGER KEELING, committed the offense charged in Count 1, he did so in violation of a temporary or permanent civil or criminal injunction, restraining order, no-contact order, and other order described in 18 U.S.C. § 2266.

All of which is pursuant to 18 U.S.C. § 2261(b)(6).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kyle Reardon for
DANIEL DOTY
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: 1/20/2021